WALMER TOWN COUNCIL
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Dated the 26th November 2026

Amenities & Environment Committee: Cllr P Findley, Cllr P Jull, Cllr P Ludwig, Cllr R Blackwell, Cllr S Waite-Gleave, Cllr M Eddy, Cllr D Richardson, Cllr M Simpson and Cllr L Ludwig.

Non-Voting Member – Mr M Knott

You are hereby summoned to attend a meeting of THE AMENITIES AND ENVIRONMENT COMMITTEE to be held at **7pm, Wednesday 2nd December 2026 at: Elizabeth House, St Mary's Road, Walmer.**

Roland Aldred

Town Clerk Walmer Town Council

AGENDA

1. WELCOME AND APOLOGIES FOR ABSENCE

2. OPENNESS AND TRANSPARENCY

To remind those present of the following: -

The right to record, film and to broadcast meetings of the council, committees and sub committees is established following the Local Government Audit and Accountability Act 2014. This is in addition to the rights of the press and public to attend such meetings. While those attending meetings are deemed to have consented to the filming, recording, or broadcasting of meetings, those exercising the rights to film, record and broadcast must respect the rights of other people attending under the Data Protection Act 1998. Any person or organisation choosing to film, record or broadcast any meeting of the Council or a committee is responsible for any claims or other liability from them so doing.

3. DECLARATIONS OF INTEREST

To receive any declarations of interest from Members in respect of business to be transacted on the agenda.

4. MINUTES OF THE PREVIOUS MEETING Attach 1

To approve the minutes of the meeting held on 24th September 2026.

5. REPORTS ON MATTERS FROM LAST MEETING.

6. QUESTIONS FROM THE PUBLIC

Receive any questions from the public.

7. HIGHWAYS IMPROVEMENT PLAN

i. To receive a copy of the current Highways Improvement Plan. Attach 2

ii. To receive correspondence from Members of the public on road issues that may be added to the HIP and decide on whether these should be added. Attach 3

iii. Verbal update on Marine Road double yellow lines.

iv. Verbal update on double yellow line scheme Granville Road – Knoll Place junction.

v. Any other additions members wish to bring for discussion (these will need to be investigated between meetings and cannot be agreed to be added until they have been advertised on an agenda).

8. THE FUTURE OF PUBLIC TRANSPORT Attach 4

To receive a written report on bus services written by a member of the public.

9. PLANTING

To receive a verbal report from the Outdoor Gym Working Party requesting delegation to Officers working with the Outdoor Gym Working Party for £2000 from the planting fund to facilitate planting along the edge of the gym.

10. STONY PATH ENC 1

To receive legal advice from the solicitor appointed on the possession of Stony Path.

13. DATE OF NEXT MEETING

2nd December 2026.

Attach 1

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MINUTES

DRAFT Minutes of the meeting of the Amenity and Environment Committee held on Thursday 24th September 2026 at 7pm at Elizabeth House, St Marys Road, Walmer.

Present Councillors:
Cllr M Eddy (Chair), Cllr P Findley, Cllr R Blackwell, Cllr D Richardson, Cllr P Jull and Cllr L Ludwig.
Non-Voting co-optee present – Mr M Knott.

Officer present: Roland Aldred –Town Clerk

Cllr R Blackwell was not present at start of the meeting

239. WELCOME AND APOLOGIES FOR ABSENCE
The Chairman welcomed everyone to the meeting.
Cllrs S Waite-Gleave, P Ludwig and M Simpson offered apologies.

240. OPENNESS AND TRANSPARENCY
The Chairman reminded the meeting of the terms of various rights to record and transmit the transactions of the meeting under the Local Government Audit and Accountability Act 2014.

241. DECLARATIONS OF INTEREST
No interests were declared.

242. MINUTES OF THE PREVIOUS MEETING
Members received the minutes of the Committee meeting held on Tuesday 16th June 2026.
AGREED- That the minutes are a true record and are approved.
Proposed by Cllr P Jull.
Seconded by Cllr P Findley.
For - 5 Against - 0 Abstain – 0

Cllr R Blackwell arrived.

243. REPORTS ON MATTERS FROM LAST MEETING
Dover District Council are looking to install warning signs to cyclist of the danger of pedestrians crossing the cycle lane in the areas where development on the beach is taking place. Members requested that the Clerk keep chasing these up.

244. QUESTIONS FROM THE PUBLIC

No members of the public were present.

245. HIGHWAYS IMPROVEMENT PLAN

i. Members received a copy of the current HIP.
NOTED

ii. Members received information on requests made to the Council for consideration to add to the HIP.

a. Members received a written report on public correspondence regarding an issue with sightlines when exiting Hawksdown on to Dover Road.
AGREED – To instruct the Clerk to speak to KCC Highways requesting a review of the junction to see if there are any solutions. From previous requests in the vicinity of this junction, we are aware that a reduction in speed or changes to road layout are not possible.
Proposed – Cllr L Ludwig
Seconded – Cllr R Blackwell
For - 6 Against – 0 Abstain – 0

iii. Members received a verbal update from the Clerk on the parking issues around Knoll Place. A consultation has gone out with a view to installing double yellow lines.

iv. Members received a verbal report from the on the parking issues around Blake Close/Grams Road, DDC have visited the site and agreed to request double yellow lines on Grams Road around the junction for safety reasons.

v. Members received a verbal report from the Clerk re the HIP item on Kingsdown Road. A design has been agreed for Slow markings in the road. The cost of this will be borne by KCC.

vi. New items to be considered at next meeting.
No items were brought forward.

NOTED – Items iii-v. Were noted

246. ACCESSIBLE KERB REPORT

Members received an updated version of the accessible kerb report. Officers and Mr Knott have been out in Walmer reviewing all roads to identify the areas of concern or where lack of accessibility could be built in to the pavement network.
AGREED – To add items labelled priority 1 and 2 to the Highways improvement plan.
Proposed – Cllr P Findley
Seconded – Cllr R Blackwell
For - 6 Against – 0 Abstain – 0

Members wished to thanks officers and Mr Knott for the report.

247. TREE PLANTING SCHEME

Members received a written report from the Climate Emergency Working Group requesting that the free tree scheme be moved forward and advertising and purchasing to commence.
AGREED – To ask officers to start the process of advertising and agree to purchase up to 50 trees in line with the budget.
Proposed – Cllr R Blackwell
Seconded – Cllr P Findley
For - 5 Against – 1 Abstain – 0

248. STONY PATH

Members received a verbal report following a meeting with legal representative on whether WTC could progress the claim for adverse possession faster than previously anticipated. Advice was that WTC would need to wait until 2029 to progress the claim.
NOTED

249. A&E BUDGET

Members received a draft budget for the activities of the Amenities and Environment Committee.
AGREED – To add an additional £5,000 towards a reserve aimed at replacing the gym once the 25-year life cycle was completed.
Proposed – Cllr P Findley
Seconded – Cllr L Ludwig
For - 6 Against – 0 Abstain – 0
AGREED – To agree the draft budget with above amendment.
Proposed – Cllr P Findley
Seconded – Cllr L Ludwig
For - 6 Against – 0 Abstain – 0

250. CEWG BUDGET

Members received a draft budget for the activities of the Climate Emergency Working Group.
AGREED – To agree the draft budget.
Proposed – Cllr P Findley
Seconded – Cllr R Blackwell
For - 6 Against – 0 Abstain – 0
Members requested that an item be added to the next Climate Emergency Working Group to discuss this year Swift Box budget.

251. DATE OF NEXT MEETING

2nd December 2026.

The meeting was closed at 20.00

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Signature Date

HIGHWAYS	IMPROVEMENT PLAN			ACTION PLAN					
PROJECT NO	DATE	DESCRIPTION	REMEDY	ESTIMATED COST	FUNDING SOURCE	PROGRESS	ORIGIN	Comments	KCC Priority no
2	Jan-22	Speed Survey ,Dover Road + 20 MPH Zones	As stated	TBA	TBA	on going	V Recas	Speedwatch group formed and are collecting data	
9	Nov-21	Cycle path to be extended along Wellington Parade	as stated	N/A	none available	KCC contacted no options provided as way forward	TBA	Question as to how this could be done given private road	
15	Jun-23	Cycle Routes - Request to join cycle route 1 to the Skylark trail by adding cycle route along Granville Road	as stated	TBA	HIP	Working with DDC to provide the best solution having spoken to KCC and not agreeing a solution	M Eddy	With DDC awaiting strategy being agreed.	
16	Jun-23	Potholes	Repair work - long term road resurfacing	ongoing	TBA	ongoing	M Eddy	Continous office are reporting these to KCC who are filing as required. Pothole blitz on North Barrack Road this month	
18	Nov-23	Kingsdown Road - Outside of Walmer Castle parking restriction	Parking restrictions	N/A	E Hertiage	English Hertiage looking at weather proofing back up car park to resolve issue	J Murray	DDC and EH have agreed to install double yellow lines along Kingsdown Road	
19	Feb-24	Walking Route	WTC to set up a route and get signage	TBA	KCC/HIP	With M Eddy for route	M Eddy	With Cllr Eddy	
20	Feb-25	Kingsdown Road - Outside of Walmer Castle Crossing the road dange due to blind bend and speed	Additional Signage	TBA	TBA	Design Confirmed		With KCC to set a install of "SLOW" painting in the road	
21	Feb-25	Upper Walmer Dover Road -speeding	20MPH zone not possible as per KCC, Speeds within acceptable limits as per Kent safety partnership.	N/A	TBA	KCC contacted due to current avg speed they would not grant a TRO		Letter written to KCC supporting a 20mph zone. Speed survey taken over week in May 2025 results were within acceptable limits for 30mph zone but not low enough to support a 20mph zone.	
22	Jun-25	Upper Walmer Dover Road - Paving	Ask KCC to review	N/A	TBA	KCC contacted no options provided as way forward		Stretch of road has been reviewed recently by KCC. Quote from KCC about scope of improvements "However, this is something that can be placed on Walmer Town Council's Highway Improvement Plan for further discussion but with very little or no scope to widen the footway and there not being sufficient carriageway width to install a pedestrian refuge Island, the only possibly feasible form of pedestrian crossing in this vicinity could be a pedestrian dropped kerb, and I am not sure that would be solving the issues being experienced. " Members considered in Sept 2025.	
23	Sep-25	Promenade outside of Adventure Golf - Safety measures regarding crossing cycle lane	Ask KCC to review	£500	KCC/WTC	Clerk to request through DDC		Some safety features installed via painting on the road Gym Working Party reviewing further measures	
24	Sep-26	Acessibility report priorities 1 and 2	KCC to review	?	KCC/WTC	Clerk to pass on report for KCC			

Attach 2

Attach 3

WALMER
TOWN COUNCIL

New Items to be considered for HIP

1.

Location	Kingsdown Road

Details of issue
Member of the public again raised the issue of flooding on Kingsdown Road. During the October rainfall the road flooded significantly as the drainage channels were blocked. Resident has once again requested that Walmer Town Council consider digging small ditches around the channels to prevent the blockages forming.

Information from KCC or requirements
In term of the residents suggestion of ditches KCC will not carry out work of this nature. DDC as the landowner have given a form of permission for WTC to carry out this work subject to approval of any contactor WTC appoints. Formal permission would need to be sought, as well as discussions around liability and insurance for the ditches and the details such as agreeing depth of the ditches. WTC would likely be responsible for maintaining the ditches and should the ditches become full of debris WTC would likely be the ones to replace the ditches. The ditches would provide some relief but eventually would suffer the same blockages if not maintained. Officers at WTC have reported the current state of the channels to KCC on the 03/11/26 and KCC have programmed works to clear these, the timescale has not been shared presently but work has not taken place after 3 weeks. Alternative solution should KCC be unwilling to do further work to ensure the drainage is maintained would be signage indicating that road is liable to flooding.

Take forward to HIP	Yes	No

Attach 4

WHAT IS THE FUTURE OF PUBLIC TRANSPORT IN EAST KENT?

Will the Bus or the Car retire in the future??



No, not yet another bus repaint from Stagecoach, but a bus from yesteryear. The East Kent Road Car Company still exists as a corporation.

Foreword

The Stagecoach SE bus company is inviting the public to "retire the car" in an advert on social media, but is that the message that people living in East Kent are receiving?

East Kent: A brief description of its economy and transport system:

East Kent as an economic area has suffered its fair share of " de-industrialisation", when the Kent coal field closed down, along with many light industrial plants, and Utilities (Electric and Gas power plants etc). The only remaining option, tourism, suffered a decline when the traditional British seaside holiday became unfashionable and was replaced by foreign holidays with almost guaranteed sunshine.
What was left was short break tourism,Air BnB, and second homes.
East Kent still remains a popular area for retirement, but that brings with it,its own challenges.
The strategic development body, Kent County Council (KCC), and Central Government has not so far formulated a coherent regeneration plan for East Kent beyond one off infrastructure schemes, that have added nothing to improving the economic competitiveness of the area, nor have they improved the transport network for the bulk of the population. So far from recognising East Kent's economic problems,KCC removed many parts of its own infrastructure from East Kent, and centralised its activities further west, where property prices and wages are higher, which seems counterintuitive.
Thanet and a coastal strip down the SE channel coast as far as Romney Marsh and Dungeness suffer high multiple indices of deprivation, poor health ,poverty, low levels of resources, low educational achievement, and substantial numbers of young people, not in employment,education, or training (NEETs).
Cheek by jowl with this deprivation and economic underperformance, almost in the next street, (at least in some parts of Thanet), is East Kent, as a popular retirement spot, where wealthy pensioners retire by the sea, as previous generations have done since the 18th century.
Thanet has always owed its existence, at least for 250 years, to the lure of the invigorating seaside environment. Deal changed from being a den of smugglers, thieves, and wreckers,in the late 18th and early 19th centuries, to becoming a genteel watering hole for the famed DFL's (Down From London), who have bought holiday homes or retired to the area.

East Kent contains both substantial deprivation and home counties level of wealth within the same communities:

All these social groups require good connectivity, which the train or the car can only deliver under certain conditions. Therefore there are two reasons to reinvigorate a declining bus network.
A good bus service enables connectivity without the expense and hassle of car ownership or requiring very expensive infrastructure as required by most railways.
Rising insurance rates, not government climate change policies, are making the car less affordable for both the young and the old.

As the age demographic continues to rise, more people will be unable to drive a car, and will need access to good public transport, which will mean a bus or something very like it. The bus can fulfil that function, as it can operate in places where the railway (the other public transport option)does not operate.

Kent County Council (KCC) are lagging behind the trend seen elsewhere in the UK, especially in metro areas like Manchester and London, in improving bus services. Currently, West Kent receives £10m in bus improvement subsidies from the government via KCC, compared to less than £2.5m for East Kent, even though East Kent is much more deprived and has a growing population of retirees.
This 4 to 1 disparity is one of the reasons why bus services in East Kent are still in a state of decline compared to Leicester, Portsmouth, and Norfolk, which are our regional equivalents. We may not aspire to urban bus service levels seen in metro areas, but is the constant cut back of bus services the only option?
Every year since 2019, East Kent has suffered persistent bus service cuts, even when government money is being fed into the network like a bucket chain of cash to the dominant territorial bus company.
This paper will look at the reasons behind those cuts in services, and how the situation might be rectified, whether or not KCC is replaced by a new Unitary Council for East Kent



Failing to plan means planning to fail. East Kent's only electric bus opportunity charger located in the wrong place.

Key points or summary of findings so you don't have to read the whole report:

1. The East Kent bus network has been cut back for years, to the point that whole areas have no buses at all.The network is 30% smaller than it was in 2019, and up to 60% smaller since 1945.

2. Transport policymaking by Kent County Council has remained rooted in "The Roads to prosperity" mindset of 40 years ago when the 1985 Transport act became law. Public transport has remained as either an impediment in their thinking to improving traffic flows, or as a one off prestige project with little connectivity to the rest of the public transport network (Thanet parkway station and Dover Fasttrack bus service).

3. Assuming local government reorganisation for Kent moves forward; an incoming Unitary Council for East Kent should be persuaded to adopt prioritising a better local bus network as a priority. This does not mean that active travel (walking or cycling) should be downplayed or that there is a presumption against motorists and their requirements. It just means a better balanced transport system.
4. Ownership of the bus network has changed several times since 1945, but the management techniques remain similar.

5. The 1985 transport act which reduced the level and altered the regulatory system for bus travel, has in retrospect, delivered very little in benefits for communities in East Kent, especially rural communities. The 2025 Bus services act has yet to deliver stability, let alone expansion, within the local bus network in East Kent.
6. The funding formula for Bus services in Kent favours the western districts by up to 4 times the level of funding received by the East, even though the deprivation, poor educational outcomes, health and social inequalities, and unemployment data, should favour greater investment in East Kent,and along the Thames estuary.

7. Apart from the Loop service in Thanet in 2015, there has been little investment into the bus network, in terms of new services or vehicles built for those services.

8. Kent County Council and Districts in Dover and Thanet have indulged in one off projects which were meant to "Level up" but in fact exacerbated existing inequalities.

9. Rural bus services are in sharp decline with large parts no longer receiving any sort of bus service, and many other infrequent midday bus services which do not meet the needs of those with medical and other appointments. A lack of transport means that the NHS has to fill the void at great cost.This is " silo managerialism" at its worst. There is a delusion that autonomous vehicles, or Direct Response Transport (DRT) tech based alternatives are the future, when in fact they are expensive divisions which constantly fail to meet the expectations that their hype produces.

10. The report proposes that a Bus operating holding company be formed that will support what remains of the small bus operating sector in East kent and Community transport. The report suggest a trial with a form of post buses as a means of adding another revenue stream to a rural bus service and a partnership with community bus schemes led where appropriate by Town and Parish Councils.

11. Passengers are often left in the dark when bus operators or councils make changes.Passenger advocates such as Save our Buses (Kent) have no formal right to be consulted. There is no passenger focus group in Kent.

12. There is a lack of transparency and accountability over service provision and funding.

13. A new Unitary local authority for East Kent (if it happens), will have to decide early on if it wishes to adopt franchising, municipalisation, mutualisation , or continue with an Enhanced partnership. The report considers the various options but does not point to a single one size fits all option. It may be that East Kent should adopt different methods of bus operation to suit the local conditions and requirements.

14. How do we manage to convince the general public that buses have a future in East Kent, and require their support, if all that is on offer are run down bus stops and hand me down buses running infrequent services?

15. Urban planning has been piecemeal and left to District councils which themselves are often dominated by rural factional interests which are often not concerned with urban matters. It is not until the developer calls on rural Kent, that there is much heed given to planning or connectivity, and even then the message is often Not In My Back Yard. The role of the bus in reducing congestion and allowing better urban connectivity is often muted in favour of campaigns to restore rural transport services.

16. As the public transport authority,Kent County Council has been singularly ineffective in producing policy, delivering new ideas, or consulting on how bus services should be run in the future. The Cabinet member for Transport seems to believe that transport policy making is appearing on facebook or YouTube announcing some small highways repair, or fixing a pavement in Thanet. It appears that the only transport policy that KCC has is "Stop the Boats". Nothing about public transport, active transport, or making our Towns and Cities better.

17. The report considers the virtual monopoly of bus services by a single operator in East Kent to not be in the public interest. The report suggests a plurality of provision ,at least in rural areas, where the territorial dominant operator has all but abandoned. This means it is not advisable to allow them to dominate if funding for rural bus services becomes available.

18. Nearly 50% of operating income for bus services comes from the state in one form or another. This shows that the market solution based on the1985 Transport act has failed to all intents and purposes.East Kent should consider how much public control is appropriate in those circumstances, and be cognizant of successful methodologies employed elsewhere.Not just in London or Manchester, but also Leicester, Portsmouth,the Hope Valley, and Norfolk.

Where we are today

East Kent wasn't always the backward looking deindustrialised forgotten region that successive governments both local and national have allowed it to become.
At the turn of the 20th century it had two electric tramway systems in Dover and Thanet, a coal field in development, a booming tourist sector, and several busy harbours.
It was an early adopter of motor buses when the Deal and District service from Deal to Kingsdown started in 1908, and became part of the East Kent Road Car Company in 1916.
In 1968 British Electric Traction or BET sold its bus holdings including East Kent RCC to the National bus company and from then until 1985, bus services were run under the East Kent name, but under NBC ownership. NBC cross subsidized bus services to keep rural areas within the network, and bus manufacture was almost entirely a UK procurement process, because of the annual bus grant.
The 1985 Transport act put an end to National Bus, and after a period as an independent management buy out, East Kent Road Car Company became part of Stagecoach under the Stagecoach SE brand, and this is where we are today.
Stagecoach SE has presided over a steady decline over bus services, once the cross subsidies between profitable and unprofitable routes ceased. KCC did subsidise various bus routes in Kent.These were mainly rural routes and were not meant to be included within the Bus Service Improvement Plan or BSIP, which emerged 4 years ago.
The Covid pandemic dealt a blow to bus services across the UK, and the Johnson government became seriously alarmed at the number of bus routes that started to disappear.
Local government was enjoined to create a Bus Improvement Plan or BSIP, where bus routes would be stabilised after the " Bus Back Better" strategy was published. BSIP's were rapidly written, often using the same consultants, and made ready by the autumn of 2021. The first funding was awarded in the summer of 2022. Unfortunately Stagecoach SE took this as their cue to announce a series of substantial bus service cuts under the 42 day rule, and this required a sticking plaster response from KCC who were forced to save a number of routes including the original Deal and District route to Kingsdown.
What this did was to leave a number of rural areas with a minimal 3 bus per day service frequency , and therefore very little growth potential.
In short, quite a large part of the network is on life support, with little hope of remission.Worst still several Town routes disappeared such as the 90 and 83 in Deal.
Since that time KCC and Stagecoach have cut and tinkered with the East Kent bus network, causing uproar from the public on every occasion. The latest issue being bus routes in Thanet.

Stagecoach SE holds to their profit before policy maxim, and KCC have shown no great desire in taking a broader view of congestion, connectivity, and economic growth in East Kent.
Where other parts of the UK are showing endeavour and enterprise in developing not just bus services, but better bus stops, better bus information systems and greater bus advocacy, Kent County Council has remained silent and focussed on other matters. Kent prefers to trumpet the few bits of highway repairs that their contractor has performed, instead of building a sustainable bus network that encourages bus travel, rather than constantly reducing those opportunities.
KCC seems uninterested in bus travel or indeed any form of transport other than the motor car. As a result many of what are small to medium sized towns and cities in Kent, suffer congestion out of all proportion to their size.

There is often great opposition to housebuilding, wind farms, solar farms, and battery farms, throughout Kent, but what is never considered is the continual growth in climate damaging tarmac surfaces, in our streets (particularly front drives), in our towns (out of town shopping centres, "drive thru" outlets, car parks, road connections), and in the countryside (mega roundabouts, highway widening, new link roads, and the lower Thames crossing).

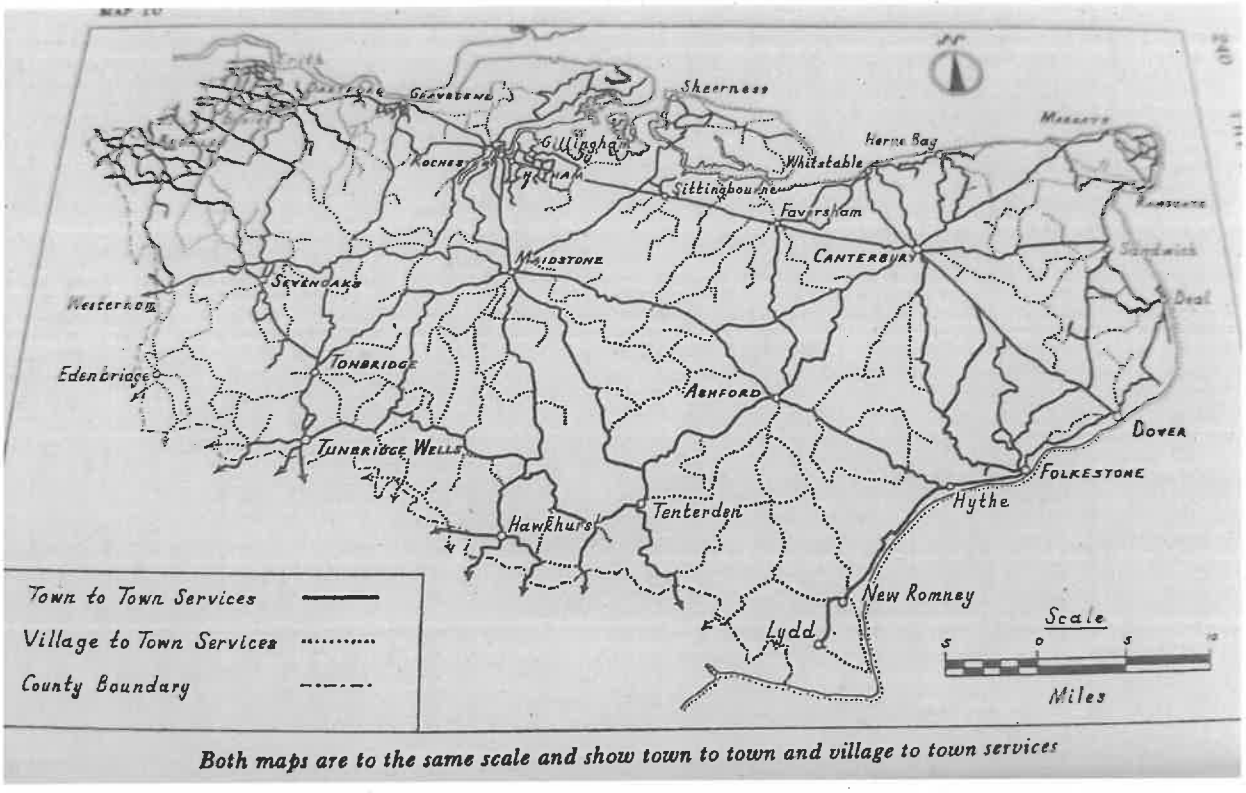
Even within Kent, bus funding is unevenly spread, and seems to ignore demographics and deprivation. One district, Sevenoaks receives **£4,013.087** of bus funding, and therefore receives more than the three Eastern districts of Canterbury,Dover, and Thanet, combined at **£3,287,053.** Sevenoaks is not noted for its deprivation, but is noted for its defence of its "Green belt". The Eastern districts do contain significant deprivation, unemployment,and challenging social structures. They have no green belt to defend their farm land or their eco systems.Sevenoaks benefits from its links to London, where many of its population derive well paid employment and incomes. East Kent has fewer job opportunities and many of those job opportunities are linked to the hospitality sector. Getting around East Kent by bus is often fraught with poor connections, cancellations and poor reliability.

Dover Fasttrack: The last 5 years have seen only 5 vehicles specifically bought for a bus service in East Kent, and that is the 5 electric single deck buses bought for the Dover Fasttrack. Dover Fasttrack epitomises the "one off culture", of bidding for funding for an individual project while ignoring the problems and challenges seen elsewhere. £34m was spent on building additional highway infrastructure and 5 buses. The bus stops are basic with no real time information systems and some are not easy to reach. To fit in Fasttrack other local bus services were cut because of limited space available at the local bus garage. The outcome has led to a bespoke bus service for those who can afford to buy a house at Richmond park Whitfield, and cuts to bus services in other parts of Whitfield, a large part of rural East Kent, and local services to Aycliffe and elsewhere in Dover.

Dec-25	Contracts			
	LB	KTS	BSIP+	GROSS COST
Ashford	14	3	13	£3,445,363
Canterbury	8	1	1	£1,097,435
Dartford	4	3	4	£1,064,199
Dover	3	0	12	£1,634,145
Folkestone & Hythe	4	0	9	£1,978,356
Gravesham	3	5	3	£1,209,980
Maidstone	12	3	2	£1,505,199
Sevenoaks	10	7	19	£4,013,087
Swale	5	1	1	£1,305,608
Thanet	3	0	1	£555,473
Tonbridge & Malling	14	8	13	£3,223,342
Tunbridge Wells	11	4	10	£3,130,328

The KCC BSIP bus funding data per district in 2025.

This is the bus network in Kent as it was in 1968



Both maps are to the same scale and show town to town and village to town services

Every picture tells a story and many of the services indicated by a dotted line in the east are no longer running and some of the services indicated in bold have at best an hourly frequency (school bus requirements excepted).

Much of rural East Kent has no longer any bus services (indicated by the dotted lines) and even with urban and interurban services there are reduced frequencies and curtailment of bus services before 8am and after 7pm, so those working in hospitality, or on night shifts, require informal support in terms of car shares or expensive taxi services if they can be had.

Funding the network: Time for a change?

What I have described so far is a bus network under continual pressure from cuts in services and a funding system that seems inequitable and lacking any logic.

- East Kent is an area of Kent with high levels of well documented deprivation (the only places in Kent that are similar are located on the Thames estuary, such as Dartford,Gravesham, Medway, Swale and parts of Romney Marsh).
- East Kent also has a significant population of retirees, who have traditionally moved into the area from London and the home counties for retirement reasons in the past.
- West Kent derives its economy from its closeness to London for well paid work.This means the railway network in the area is important for commuter services.The bus is there to link its rural communities with those railheads and shopping centres.
- Both retirees and those on lower incomes rely on bus services more than wealthy commuters so why is one western district (Sevenoaks)receiving more bus funding than the three (3) eastern districts of Canterbury,Dover and Thanet combined?

The answer to the last question is, I think, historical. Both KCC and many of the District Councils in Kent, are dominated by rural interests or factions. In effect from time immemorial the 27% living in rural areas, dominate electorally the 73% living in Towns and Cities. There has also been a preponderance of Cllrs from West Kent in charge of the higher echelons of KCC.KCC often deny it, but Western interests often overreach those of the East, and the minority rural tail, wags the urban dog. When one looks overall where the administration of KCC is based, and how it delivers policy to the county, it often seems almost colonial in outlook. A repeat of Sanders of the river (Medway) handing down policy to the natives of Canterbury, Dover, and Thanet.
Part of the reason why there was indignation and threats of legal action from KCC, was the disbelief that Kent wanted to throw over 140 years of their benign rule. The latest occupiers of the high seats at the Sessions House are merely repeating that indignation because they think their domination might be splintered or watered down.
For confirmation of what has been stated is true, one need only consider the continual growth of poverty and deprivation in very many parts of Kent, especially in the East. At no time has KCC come up with an adequate response to regenerate or rejuvenate the economies of the Eastern districts.Instead they have left it to the central government, various funding bodies and in the past the European Union to fill that void.KCC's stance has been to maintain the status quo, and not to deliver economic relief, unless someone else was funding it.

Bus funding of services is a measure of that policy. Why is £4m going to Sevenoaks alone and £10m cumulatively going to the 3 Western Districts, when deprived communities and those with a high number of retirees are getting a much smaller share of the bus funding cake? I have asked KCC, and they are reluctant to say, but this is why I think it happened:

- There are a number of small towns and villages in the West, which are adept at pressuring their County Cllr for decent bus services.
- KCC funded quite a large number of those bus services, and often they are run by SME operators.
- When the BSIP came out, KCC saw an opportunity to offload those services onto the state funded scheme. They are not supposed to do so, but a dozy Department of Transport did not stop them.
- The East had fewer of these bus services, but after covid more of them required funding. In the East the axe was wielded, but a few services were given first aid and left in a zombie state, but those in the West continued onwards, as if nothing had changed.
- In the East we have a "pass the parcel" situation between KCC and Stagecoach, with both pointing the finger at each other and the passengers. In the West silence, and continual high levels of funding.

What happens when Angela Rayner presses "play" at the Ministry of Housing ,Communities, and Local government (MHCLG) over local government reorganisation?

This is the time when the nascent Unitary councils should make a very strong case for there to be a true "levelling up", not a sham one.The bus funding scheme will no longer be in the hands of KCC, it will be up for grabs.The Eastern Districts be it an amalgamation of 3 or 4 districts should press a very strong case for a better distribution of funding. I think there is a case for at least for £2 to 3 million to be vired over from West to East. on this basis:

- The original funding scheme was based on an historical anomaly that should never have been implemented in the first place. West Kent has received far more funding than was fair or reasonable, and while it would be unfair to insist on reparations, their wealth and economies can sustain the loss of that funding far more easily than East Kent can sustain the current situation.
- In order to boost the local economy, improve employment, improve health outcomes , and reduce isolation, East Kent deserves better funding of its bus services.
- East Kent's own rural bus services have been devastated as seen by the map shown above, and the additional funding could be used in part to repair some of the damage caused in the recent past.

Should this notional sum of money, if it ever appeared be simply funnelled into the pockets of Stagecoach SE?

No, I think if the Department of Transport thought that would happen, the funding would not be given. Instead, what is needed is a thorough bottom up appraisal of how a regional bus network should operate. If a case can be made on that basis, it is possible that not only the equitability funding, but other funding could be reasonably secured. How we do it and what would be different is what we should consider in the next sections of this paper.



An interurban bus service turning on to a former turnpike, a bus service little changed in concept in 100 years

Planning the network: What are the options for rural services?

All over the UK rural bus services are declining at a faster rate than ever.The factors behind this situation are:

- Rising costs in providing bus services, which impinges on rural bus services in particular..
- Static or declining rural populations.
- Changes in the social structures of villages and small towns in the rural areas.
- A concentration of investment on delivering better bus services in metropolitan and larger urban conurbations to the detriment of services in rural areas.
- The decline of the small and medium sized bus operator, who were the mainstays of many rural bus services.

Rising costs: In the past staff costs could be minimised by paying them less in rural areas compared to urban areas, and after the 1985 Transport act, terms and conditions of bus staff declined. This meant it became harder to attract and retain staff, and staff shortages led to cuts in the least profitable bus services, which were often those serving rural areas. With the introduction of minimum wage levels this had to change, but was only offset by a long period of static wage growth at the beginning of the new century.Now staff costs are no longer static or controllable as they once were. Diesel which powers the majority of rural buses has risen considerably due to the Ukraine and Iran wars. Buses themselves are more efficient, but not enough to stem the increase in operating costs. Staff costs historically ranged from 50 to 60% of total operating costs, and may now be nearer 65 to 70% of total costs.
Bus companies receive a subsidy towards fuel costs which favours diesel fuelled vehicles called Bus Service Operators Grant (BSOG), Operators also receive payments towards reimbursing the £2 fare cap (if they participate), and Concessionary fare scheme. Local authorities may also support individual routes and under the "Better buses" funding additional payments may be made towards additional services funded via local authorities. Which services and which parts of a local authority area that gets this additional funding is at the Local authority's discretion, hence the complaint that Western districts are being favoured over Eastern districts. In a recent submission to the Commons transport Cttee the Department for Transport stated that most bus operators are subsidised in one form or another by state funding to a level of around 50 to 60% of running costs.

Static or declining rural populations: Visiting parts of East Kent it is quite interesting to note that development has ceased since at least the 1980s. In some communities the youngest buildings may be even older. The determination to keep development out at almost any cost, has been helped by the structure of local government, where District Councils in particular, are dominated by large rural areas attached to urban areas, and urban areas competing against each other for resources (Dover versus Deal and Sandwich, for example). Kent County Council not only has a historical bias towards the west of the county, but also towards rural parts of the county.
The imposition of housing targets has made this rural isolation more difficult to sustain, but also attracts the sort of development that continues the trend of non diverse communities. Because few if any houses are being built, and households are becoming smaller not larger, populations in many rural areas are at best static if not in decline.

Changes in the social structures of villages and small towns in the rural areas: In the past many small towns and villages were self sufficient and contained a variety of trades and skills to service that sustainability. The mechanisation of agriculture was gradual throughout the industrial revolution, and those displaced looked for work in the towns and cities. In 1851, Britain had a majority of the population living in urban rather than rural areas, the first country in the world to do so. The railways network spread widely, but not everywhere was covered, even by the "light railways", so called that were cheaply built with no fencing or signalling to speak of. The motor bus changed all this, because thanks to improving roads, they could penetrate into the most isolated parts of Britain, where railways would never go and offer connectivity at an affordable price.
By the 1960's however things were on the move. Increased mechanization via the tractor and combine harvester, decimated the remaining agricultural work force. Car ownership became cheaper, and rural bus services retreated as people turned to using cars, and the phenomenon of the "escape to the country" became a reality for many former suburbanites. These tended to be older, more wealthy individuals, and so village schools closed, their pupils being bused or driven to an urban based school. Village shops closed, unless they could adapt by being farm shops or being part of a pub.Even pubs closed. In the village I grew up in, the school, all the shops, and a pub, all closed. Even the church now only has infrequent services.
Many villages changed from being agricultural communities, to become commuter based dormitory communities, or "pensioner pockets", where silence is golden, and there is little traffic for bus operators. If we add in the trend towards second homes, holiday homes and AirBnbs, the likely traffic is sparse to the point of a nullity. Unless you have access to a car and the of course the wherewithal to buy a property in a village, village life may not be sustainable.

A concentration of investment on delivering better bus services in metropolitan and larger urban conurbations to the detriment of services in rural areas: If you are one of the big 4 bus operators, where would you place scarce investment capital? Would you spend that capital on acquiring vehicles to run mostly empty on unremunerative rural services, or would you try to acquire a piece of the public transport pie, in the larger towns and cities, even if franchising is the only option on the table? Increasingly, that is the trend with bus operation. First bus have ditched Cornwall and parts of Devon, but acquired franchise operations elsewhere and also coach operations. Stagecoach have sold their very North of Scotland bus services to the Highland Council, and withdrew entirely from Dumfries and Galloway, within a matter of weeks; while acquiring franchises in Manchester and London.

The decline of the small and medium sized bus operator, who were once the mainstays of many rural bus services: this is not a new phenomenon, as many small bus operators were bought out, closed or ceased to operate, since modern bus services existed, but their passing has been a considerable loss for rural services, because they were often part of the community, and ran services as part a combined, bus service, school bus and coach service, using the same few buses for all services. Competitive tendering meant that bigger operators undercut them, and then when they were gone, there was often no alternative contractor. A short term gain, for long term pain.

So what can be done for rural bus services?
The current options for rural bus services are:

- Fare stage services running to a timetable: increasingly rare and reliant on a de-minmis level of population en route.
- Demand Response Transport or DRT: a "ring and ride" service using a computer algorithm to decide on who gets a ride, and sometimes the route.Many have opened at great cost and most if not all have failed, because of the lack of certainty on timing and obtaining a ride.
- Community transport: This can be a "ring and ride" or sometimes a timetabled service. Some of the more successful ones are small networks with a mixture of paid staff and volunteers.

Bearing what I have set out over operational costs and rural populations, the best option would appear to be to increase the numbers living in rural areas. However, this cannot be done overnight, and would in any case, continue to meet the same levels of resistance that is seen today. Those suggesting that planning restrictions, or the actions of the Environment agency and Natural England, are the cause of a lack of development in rural areas are wide of the mark.

Rural communities have often made it very clear that housing, solar farms, wind farms, or other infrastructure are not only not wanted, but will be resisted.
If rural communities are happy to be car dependent, it is not up to local authorities to insist that they have bus services of any type.
However, there is a growing realization that rural areas are isolating for those without a form of personal transport, or the means to hire in that transport. This segment of the rural population is growing over time, as those who migrated to, or were brought up in the countryside, become older, and more frail. Hospitals, doctors surgeries, even pharmacies, are often urban institutions. Some services such as food deliveries etc can access the countryside via vans etc, but not everything. Providing social care in rural areas is costly, and the chances are the patient will either have to pay the cost of travel or be faced with being admitted to a care home. Most retirement and care homes, are based within or at the periphery of urban areas, with only the most expensive care homes based in an entirely rural location.

So what can be done?
Restructure some of the current routes so that take in some rural areas: This is not ideal for the bus operator, but there are some routes which are run infrequently at a loss, which could either be tagged into an overall urban network, or made part of an interurban service, but run on an hourly basis, instead of more frequently. So for example a bus travel from A to B every half hour, but within that service in the hour, will divert to include village or small town C along the route. This will require a lot of retimings, but some of the current routes did that in the past, and savings could be made by joining other networks. An example being the 81 route which used to go from Dover to Sandwich via various villages. It now is divided in two, but it could call into St Margarets every hour, and use the Dover fast track infrastructure to save time and add more passengers on the way, by increasing the frequency of the Whitfield to Dover section of the route.

Apply more funding to rural routes: This is a possibility if the proposed eastern unitary council receives a fairer funding formula, but this has its limitations and cannot just open up more bus routes that will be underused.

Work with Small and Medium (SME) operators: This is where I think there are more possibilities. The new Unitary council could create a bus holding company, which would work with the smaller operators and community bus operators to deliver infrastructure at scale. I would propose that a new bus garage be built in Canterbury to hold and service SME vehicles, and Community vehicles.

The vehicles should be standardised on a single make, if not size, and be owned by the bus holding company, which would rent them out to the SME's and Community bus operators.I would propose that all rural bus services, including school bus services be run by this bus holding company and let out as appropriate to whatever SME or Community bus operator would best serve each area. In view of the fact that Stagecoach has withdrawn from most rural bus routes anyway, their network should be restricted to urban and interurban services.

Community services: In view of the lack of passengers in most rural catchment areas, I would propose that each and every rural Town and Parish Council be invited to a local rural transport conference to discuss the options. Those that are keen to operate their own community bus service, should be encouraged and helped, via administrative back up, engineering support, and some operating grant finance. Wherever possible communities should be encouraged to work together to deliver a cohesive community bus network, with the proposed Canterbury bus garage and office as the centre of a comprehensive support system.

Return of the Post bus: Every town, village, and hamlet, will receive deliveries from the various delivery companies (Evri,Royal mail,DPD, UPS, and Amazon). It may be possible to combine a basic bus service, with a delivery round using lockers or other places such as village halls etc, so that the number of deliveries required reduces and the bus route has an additional income stream, apart from passenger numbers. The service would be slow, but it would be sustainable, and not subject to an arbitrary 45 day cutoff as at present. I think a trial or pilot ought to be researched, and then negotiated by the new Unitary council.

Conclusion:

- **None of these options will be as expensive to run as the current subsidised fare stage or the very expensive DRT services.**
- **They offer some kind of sustainability and community input, which the current offerings don't.**
- **Currently what is on offer is top down and either bus company or politician led, which often means a short term outlook.**
- **If rural areas really want to see the return of the country bus, they may have to accept some development to increase the population, and do something for themselves. I see no future in Stagecoach running rural bus services, their retreat from such services is noticeable, and all that is happening now is putting off the evil day of complete withdrawal.**

Franchise or bust: Is franchising the best or only policy for the future?

In the last decade Bus franchising has been the subject of debate, with free marketeers and take back controllers arguing about its merits. Stagecoach (and Rotala) were prominent in opposing the first major franchising project outside of London, in Manchester. Stagecoach lost and it led indirectly to their sale to the Frankfurt based DWS infrastructure fund, which is part of Deutsche Bank. Since then franchising projects have popped up in Liverpool, West Midlands, West Yorkshire,South Yorkshire, Wales and Cambridgeshire and Peterborough, with others on the way.

The arguments for are:

- Control is required to stop the 45 day termination of bus services.
- Improves connectivity between modes of transport, because transport planning has some kind of input,compared to the laissez faire methods seen elsewhere in the UK.
- Increase frequency, reliability and value for money of bus services.
- Accountability.
- Cross subsidisation (especially relevant regarding rural bus services).
- To expand rather than reduce the number of bus services available to the public.
- Reduce congestion, by making the bus more attractive than taking the car.

The opponents of franchising say:

- "Enhanced partnerships" (EPs) between bus companies and local authorities can deliver all the benefits of franchising at lower cost.
- EPs are available now, and are not "pie in the sky" like some franchise projects.
- Bus companies are more experienced in running bus services and have the technical knowledge.
- Franchising is an expensive method, and the money would be better spent elsewhere.
- Expensive to implement.
- Delays in transition to franchising.
- Reduces competition.

So who is right?

The answer is both depending on your perspective. Franchising gets good publicity because it fields lots of lovely new buses in bright colours, running fast, frequent , reliable bus services, compared to say East Kent, where Stagecoach operates services using older transferred in or "cascaded" vehicles from those franchised areas, which breakdown,get cancelled, or arrive late or never, and where the bus network is shrinking by the month.

On the other hand Leicester has an Enhanced partnership and it too has lots of new buses (it will not be long before Leicester operates all its bus services with low emission vehicles), fast, frequent, reliable, bus services at an affordable price.
The Prime minister has promised good growth, led by better bus services in every post code. In Manchester that is already happening. It is hard to see East Kent achieving that growth with second hand vehicles decked out in the funereal steel blue livery. Some places, no matter what metric one employs cannot seem to get their act together.Whether that metric is bus services, social housing, adult social care, education,the NHS, or economic development, East Kent lags behind the rest of the country.

Conclusion:

- **Kent County Council (KCC) will not countenance bus franchising under its current or former leadership. KCC still believes that improving roads will ease congestion, and they have no solution to the decline in rural bus services. KCC does not oppose Stagecoach when bus services are cut, unless the opposition is substantial. Their view is that "we have no powers" to alter decisions made by bus companies .**
- **An incoming Unitary Council to replace KCC in East Kent, will have many calls on its time and money, and franchising may be seen as being in the "too difficult" category.**
- **I have outlined what could be done with rural bus services, and that should be a starting point. Stagecoach could be leveraged out of rural bus services and then route by route, encouraged to pursue other opportunities in Manchester or elsewhere, by a gradual process of municipalisation.**
- **In the meantime bus services could be rebranded under an East Kent identity, with better bus shelters and information systems rolled across the Unitary area. The unreliable Stagecoach app could be replaced with an East Kent rail, road and bus app, giving a unified transport offer. Tickets at least initially would be delivered by GBR and Stagecoach by being directed to them from the app.**
- **The Unitary council should prioritise obtaining fair funding from the Better bus funding scheme, so that some of these things can be started.**
- **The current enhanced partnership should be renegotiated, and Stagecoach should be made aware that past performance is not good enough. A new Enhanced partnership adopting many of the positive points of the Leicester EP ought to be discussed.**

- **The future for East Kent may look like a municipally led transport company for rural services, enabling SME bus operators and community bus services to thrive. An Enhanced EP for urban and interurban services, transitioning into a part-franchised, publicly owned bus network, interconnected with other forms of public transport.**



The future and the past at Pencester bus station, an Electric bus passes a second hand diesel bus transferred by Stagecoach to run the first Dover Fasttrack services.

Can we retire the car?

Stagecoach thinks we can, in their advert aimed at the older generation to persuade them to ditch the car for the bus.

This is a tall order. The generation that saw the transition from mass public transport to mass motoring was the generation we now term as the " Baby Boomers". That generation were sold on the car being the solution to life's problems. Car ownership conferred status and upward mobility, but right from the start there were problems. Even back in the 1940's when there were around 1 million cars on the road, there was congestion in town centres ,and on some main roads and parking became an issue. Local authorities got rid of trams, trolleybuses in urban areas, supposedly to free up space for improved traffic flows. Town centres were demolished to make way for freeways, car parks and wider avenues.

The towns we most revere today, such as Deal, Whitstable and Sandwich, are the places where road improvements were minimal probably for financial or engineering purposes. Canterbury and Ashford were continually " improved" all to no avail. Folkestone, after all the past precedent of road improvement failure is still being "improved", and boy has it met with problems.

The arch priest of road traffic management was Prof Colin Buchanan, who wrote a book called " Traffic in Towns", where he admitted that congestion in Towns and Cities was hell for the inhabitants, and proposed instead that they live in traffic free islands, with traffic speeding past them on freeways and fly overs. Ashford is a Buchanan town and congestion has not ended there. Canterbury is one step away from gridlock, and Thanet makes Lego seem positively permanent. Traffic in towns was published in the same year, 1963, as The Reshaping of British Railways, alias the Beeching report.

The Beeching report is now excoriated within many social circles, and we have now moved towards the railway as a vital artery and people mover, with the social railway in rural areas. Unfortunately, the same has not applied to bus services and roads management since Buchanan's book was published.

Bus companies, including Stagecoach, plead with local authorities to improve traffic flow for buses, and their pleas fall on stony ground, because of the public resistance to Bus lanes, Bus gates, Low traffic Neighbourhoods, and traffic restrictions of every kind.

If we also add in the wild west frontier of Utility public works management, we have a perfect storm.The buses are slow and infrequent, because we insist on making the roads an obstacle course for traffic flows. The public cohort most resistant to " retiring the car" in any form is the Boomer generation. They are the ones depicted looking angry over the slightest change in parking charges, residents parking fees, and traffic planning measures where the car is restricted. The politicians know this and this is where the "war against the motorist" refrain originates. Every politician knows that being pro car, and anti car restriction, will gain you support, even if the outcome is negative.

What might change this state of affairs?

- It is possible that lower oil prices may be permanently a thing of the past, as unstable autocracies battle it out for supremacy, and use controlling oil supply pinch points such as the straits of Hormuz, as a way of applying leverage.
- Demographically,the UK is becoming older, this means that driving everywhere may not be an option for older drivers, as it once was. You may not automatically assume that you will be fit to drive, and like your Mum and Dad, your car keys might have to be hung on the hook permanently.
- Many of Britain's town centres have seen better days, and there is a growing trend to restrict the car from many parts of every Town centre, as a prerequisite of regeneration. If that is the case, then taking the bus becomes the sensible option, afterall no one in their right mind drives to London to avail themselves of its attractions nowadays, and the same may become true of Canterbury for example.
- Park and rides are a better option for shoppers and visitors, and hopefully this trend will continue. In Canterbury expanding park and drive,and encouraging public transport and active travel, will free up space that can be better used for housing, and bus travel.Few cars will mean more buses and quicker journeys.
- At long last, the environment and impending catastrophe over climate change is changing minds and taking the bus is one way of "doing your bit", in slowing down climate change. Even taking the second hand Stagecoach bus reduces your carbon footprint compared with using the car.
- There are still those who think that technology will come to the rescue of the car, by making it autonomous.Unfortunately, a digital being, cannot operate in a human analogue world no matter how hard the tech companies try. To understand the level of delusion this has reached, the Shadow Chancellor, Andrew Griffith proposed their use in rural areas to replace the bus.This ignores the fact that all autonomous vehicles rely on radar, and lidar as sensors, which are next to useless in urban areas, but even more so on poorly maintained rural byways where clear lines of sight are often not there.

Conclusion:

We are at the stage of knowing that taking the bus is the right thing to do, but just not yet. When the penny finally drops amongst the majority of the public, the politicians will change their tune. Retiring the car is a possibility, but just not now. We don't have to wait for any change in technology, because the solution is already here.

What do you do about a bus company like Stagecoach?

Stagecoach is a company that is hard to like.Their birth was controversial, because their original leaders Souter and Gloag, were, and are, controversialists. Most of the other bus companies came into being as conglomerates of various smaller operations, and have never had leaders of the sort that Stagecoach once had. Since their appearance and market dominance in some areas, thanks to the changes wrought by the 1985 transport act, it is not hard to find bad news stories about Stagecoach, usually involving cuts in services or wholesale withdrawals as in Dumfries and Galloway.

Their tax affairs are now being publicly scrutinised, as it seems that Stagecoach is using intermediaries in Luxembourg and Delaware. Now to be fair, this may have been the case for some time, before DWS took over Stagecoach. It may also be true that other bus companies are doing something similar. Most of the major bus companies running bus services in Britain are foreign owned, except First bus and National Express, so they may all be using such tax avoidance measures, its just Stagecoach were found out first.

The problem with this tax scrutiny is that bus services in the UK rely on a significant level of state subsidy to keep running, and if Stagecoach or any other bus company wants to continue to run buses in the UK, they must understand that the rules of engagement have changed. You cannot on one hand plead poverty, and viability, and then use tax avoidance to reduce the very source of funding you rely upon.

Locally the problem with Stagecoach SE is one of being out of step with the changing climate. Stagecoach seems reluctant to build a relationship with its public based on trust. There is a constant drum beat of cost cutting irrespective of the harm it does to communities being served by those services, and they come over as being uncaring and only offering a take it or leave it approach on bus service cuts. It is not helped by a local authority, KCC, that seems uninterested in bus services and is committed to an unfair distribution of public money.

Conclusion:

- We will probably have to accept the status quo as long as KCC is involved in public transport.
- I urge both the Secretary of State for Housing, Communities, and local Government, and the Secretary of State for Transport to implement the reorganisation of local government in Kent, implement devolution measures for Kent, and investigate the Enhanced Bus Partnership and its current funding structure in Kent, as soon as possible.
- An incoming Unitary Council for East Kent should arrange to hold a far reaching meeting with Stagecoach SE, to determine what plans if any Stagecoach SE have for investment in the local bus network, and to discuss whether Stagecoach SE intend to continue operating bus services in East Kent.
- Following that meeting the Unitary Council should then discuss rural bus services with Stagecoach on the basis of what this report has suggested. There should be a discussion on how a future enhanced partnership or EP will work, that will differ from the current version, and discuss a plan to improve bus timings by taking action on road use and utility works in the council area.
- Emergency plans should be drawn up to prepare for a wholesale withdrawal of bus services in the council area, in a fashion similar to what happened in Dumfries and Galloway.



The Optare (now Switch Mobility) Solo, the mainstay of many bus services.

Telling truth to power: Accountability, transparency, and the passenger voice in the future.

One of the requirements of receiving funding for "improving bus services" from the government is the formation of a focus group or some kind of representation for bus passengers. So far there is little evidence of such a body existing to advise and consult with Kent County Council (KCC). Where KCC gets its input from bus passengers is anyone's guess. I think it relies on individual passenger groups to bring concerns to their attention. What this does however, is create a partial picture for KCC to consider, based on who shouts loudest . So Thanet may complain about a bus service in one month and the next it might be Swale, Sevenoaks, or Maidstone. Those areas who don't complain or who have no passenger group or at least one that does not complain, gets ignored.

What does happen is the formation of an overall coherent picture of how bus services are run, their reliability, and whether they are meeting the needs of the inhabitants in any given area.

If KCC is relying on its Cllrs to provide the necessary intelligence, then that will be subject to quite a large dose of subjectivity. If the Cllrs contain a large cohort of what I call the " the Clarksonian fringe", who think buses are slow, an impediment to traffic flow, and that only poor people use them. Just how useful will that strand of intelligence be?

I have seen at least one County Cllr campaign on free parking in town centres, and not a peep from him about improving bus services, and he is not alone. At KCC there is a core of opinion that not to support the free movement of motor vehicles is somehow unpatriotic, and those suggesting alternatives are "woke".

We cannot rely on politicians solely to determine how bus services will run in East Kent, as they are generalists and have many other calls on their span of attention. No, what is needed is an area wide representative passenger consultative body, that can inform, and collate, useful information and knowledge, so that a council can make informed choices.

Conclusion:

When the new Unitary Councils are formed, they should immediately recruit a focus group, or board of public transport, especially bus passenger representatives. Each Council will differ in their recruitment process, but it is recommended that serving or recently politicians should be excluded, so as to counteract any form of bias. The body should not become a repository for those who lose an election and are seeking a purpose in life, as happens on so many public bodies. If Kent is included in a devolution process, the relevant amalgamated body, should include a relevant passenger focus group, for all forms of transport.

The Integration game: How should buses, trains and active travel integrate in a holistic way?

You would have thought this is obvious, but we have all been in the situation where the bus turns up at the railway station, as the train pulls out. In most advanced transport systems integration, cooperation, and joined up thinking, are the order of the day, and of course Switzerland is the oft quoted example of such methodology. In Britain, privatisation, managerialism, and obtuseness are often the enemies of integration, some managers seem to take perverse pleasure in ploughing their own furrow, as a sign of independence.

It was not always so. In the days when municipal ownership was common , various forms of public transport ran in a complimentary fashion. The best example being London transport, that ran buses, trams and underground under one cohesive body. It was not perfect, but even today, we often do not reach that stand=ard of integration. Transport for London ought to be able to integrate all forms of transport, but struggle to do so. Manchester is attempting the same, as our several other major cities. In Derbyshire's Hope Valley a £12m public transport scheme called "Mini Switzerland" is attempting to create a fully integrated Swiss style transport network, which is interesting, in that the rest of Derbyshire, is run on the unintegrated laissez faire system employed in Kent.

Conclusion:

- **East Kent has a developed tourist industry as is found in the Hope valley, and it too could deliver a " Mini Switzerland" integrated transport scheme if the impetus was there when the new Unitary Council is formed. Even today East Kent has a good railway network, and with the right organisation the bus service network could be brought up to date.**
- **Even if East Kent could not get funding for its Mini Switzerland, it could make efforts to integrate all forms of transport, by insisting on a policy of cooperation between bus ,rail, and road. If devolution happens, Kent will have the means and the power to integrate transport if it wishes. Not integrating transport is inefficient and harmful to the economy.**
- **Having passenger focus groups and good point of contact facilities, interchanges, and effective branding of public transport is a prerequisite of achieving Swiss style integration everywhere.**

Point of sale: Improving the passenger experience.

For bus passengers the point of sale is the bus stop. These will be a single post made of aluminium, with a timetable attached to it. If there is a bus shelter it will be minimalist, in poor condition (covered in verdigris,often vandalized,and the roof stained), and offering minimal shelter and comfort. It will lack lighting, real time information, and a welcome to passengers. In short our bus shelters offer cold comfort, and are a statement of our increasingly deracinated transport system. Is it any wonder that recruiting bus passengers is so difficult, when the alternative, the car, offers all round shelter, in-car information systems of increasing complexity, heated seats,air conditioning, and to some, security. The fact that there are 3 times the number of fatalities on the road as there are homicides, and that the news media reports a never ending chronicle of car accidents, breakdowns, fires, and congestion, seems a small price to pay for the convenience of car use.

Too many bus managements waste their time in fighting internecine bus wars between companies, as in Preston, than they do in confronting the real competitor, the car. Too often the bus itself owes more to an accountant's view of what a bus should be like, with its rock hard plastic looking seats, poor ventilation, noise, and up to no, lack of electronic information systems.It's near relative the coach, does understand about the car as a competitor, and offers a far better standard of in-coach comfort.
The argument bus companies will make is that bus journeys are often short, and therefore coach style comfort levels are unnecessary, but one of the things that Franchise bus operations have picked up on is overall branding.

Franchise buses are often better equipped, branded in bright primary colours and appear welcoming to passengers. Stagecoach on the other hand offers a funereal steel blue livery, very basic accommodation, age related rolling stock, and a down at heel image, which also applies to their provision of bus stops.

Conclusion:

- Each and every bus stop should be visited regularly, and any faults put right, such as ensuring the post is on the perpendicular, and that the bus stop is clean and well kept.

- There should be an ongoing process to requip as many bus stops as possible with shelters that offer good levels of shelter, lighting, decent seating,and real time information systems.Even if this takes a decade to complete, a start should be made as soon as possible.

- Bus services in East Kent should be rebranded. I am afraid the Stagecoach brand is dead in the water, and offers the sort of public popularity that only the water companies and clearing banks can rival for negative connotations.

- The smashing up and redevelopment of bus stations must stop.The example of the poor outcomes with the redevelopment of Folkestone bus station into an urban park is but the latest example of where the bus passenger has been relegated to third or fourth place in council urban planning priorities.

- For a fraction of the money,Folkestone could have obtained a state of the art bus station, with good lighting, real time information systems, comfortable seats and excellent shelter, while incorporating some elements of an urban park. Whereas now it has a row of not very appealing bus stops in a line, with very little information, so bus passengers have to scuttle up and down the row of bus stops to find the correct one. Buses are now stopping on the highway rather than off road, so the possibility of congestion increases where there was none before. In short if you want an example of how not to deliver an urban transport plan, Folkestone is the prime example.

Journeys end : is there any future in doing nothing, or is it time for a more dynamic response?

- Public transport has often gone through expansion, contraction, dereliction, and regeneration. "Manchesterism" as it has been termed, has put connectivity at the heart of its economic plan. There are those who hold that it is all smoke and mirrors, but Manchester is showing economic growth where elsewhere there is very little. Its bus services show a dynamism and "can do" attitude sadly missing in East Kent.

- In East Kent bus services are dominated by a single operator, Stagecoach, whose recipe for the future seems to be managed retreat of bus services from our roads. Is that what we want? Is it good for our economy?

- We are waiting for the Ministry of Housing, Communities, and Local Government to press play, and to restart the process of unification of council services. It cannot come soon enough because the present two/three tier system has delivered only economic deprivation and Operation Brock to East Kent. There is a kind of hopelessness which pervades social and economic life in East Kent. Simply throwing money at the problem will not deliver regeneration. Millions have been spent on transport projects (Thanet Park way station< Dover Fast track bus, and Sandwich platform extension), without any thought of transport planning, and integration. Poor urban planning in Canterbury, Thanet, Folkestone and in Dover District, has created more traffic congestion not less, while leaving Rural transport either bereft or on life support.

- I have laid out some ideas for consideration by what I hope will be a new Unitary Council for the area, and hopefully better still for a new devolved administration for Kent. The statement I am making here is, yes, the area needs more investment, but above all it needs much better leadership overall. It need cooperation, a flow of ideas, not culture wars, populism or the politics of resistance.

- As an appendix I have included a submission I made to the Transport Commissioners consultation, which emphasises the points made here.

APPENDIX:

CHIEF TRAFFIC COMMISSIONER'S CONSULTATION ON PERFORMANCE STANDARDS

Respondent: Richard Styles.
Representing: As a member of Save Our Buses (Kent).(The views set down here correspond with the broad view of the group but may differ in some respects.)
Size of group and contact method: 1120 members, communicating by means of Facebook.
Traffic area: East Kent and the traffic area corresponding to that of the dominant territorial bus company/ operator.
Bus Company: East Kent Road Car Company trading as Stagecoach SE.

Question 1

Is the 95% standard for timetabled services to run between one minute early and five minutes late still relevant today, and that it should apply to all timetabled services? If not, please state what the standard should be and how services could be differentiated?

The 95% standard does seem a reasonable standard to set, but it still remains in many ways, aspirational since the last consultation. Empirically it must be noted that few if any bus services sampled in the area reach this standard. It would be helpful if Transport Focus or Bus Users UK regularly sampled bus services in this area, as there is often a disparity with what the bus operator says are their performance standards and the actuality met on the ground by bus passengers. In short there is a lack of undisputed traffic data, and the data that exists is hedged by commercial confidentiality and bureaucracy. The enhanced partnership between Stagecoach SE and Kent County Council (KCC) should have helped in this regard but does not appear to have made any difference.

Question 2

Where an operator's performance is between 80-95% would it be appropriate for a clearer statement to be set out in the Statutory Document that a traffic commissioner would usually allow time for performance improvement plans to be put into place and performance to then be assessed over a period of time before considering formal regulatory intervention at a public inquiry? Please state any circumstances where you consider a public inquiry would be appropriate.

This again is a matter of data reliability. How does the commissioners office receive data from the operator in order to deduce whether the operator's performance has reached the 80-95% threshold in order to start this regulatory process? What I can say that our group and others receive countless complaints on bus service performance, most of which are transmitted to the bus operator, where they are noted? KCC as Enhanced partner and holder of the Kent Bus service Improvement Plan, also receives complaints which generate little action. I am not sure if or when Stagecoach SE have been at the receiving end of this process. I do remember the traffic Comissioner taking action in the case of Devon General ltd trading as Stagecoach Devon, but nothing like that has happened in East Kent.

To answer the question directly I think it is reasonable for there to be a period to monitor an improvement plan on performance, because a public enquiry would be expensive and the company would no doubt employ a KC(s) to defend its actions; resources which could be otherwise be spent on improving service performance.

An enquiry is a serious and expensive matter and should only be applied where:

- The entire network is in danger of collapse due to poor service standards, a lack of investment, and a constant threat of withdrawal, such as happened in Dumfries and Galloway and in West Cornwall.
- That repeated prodding from the traffic commissioner's office has not resulted in any worthwhile response from the operator. In short where the operator has shown complete disregard for regulatory process.

Frequent Services

Question 3

Does the 15-minute performance period for frequent services remain appropriate? Please provide any views on any impact in extending it to 20 minutes.

There are relatively few "frequent" services in our bus operating area.Only the canterbury parka and ride service which do not fall within the ambit of this process, the "Thanet Loop" and Dover fast track which should be running 5 buses in a circular system but doesn't because of faulty project management, and some services serving universities in Canterbury. Most services in the operating area, are nominally 30 minute frequency, or hourly, with others running once per day or three times per day.
If you are going to run 20 minute frequency services, then that is little different to the standard 30 minute services. " bunching will occur for various reasons whether the frequencies are 15 or 20 minute divisions. There are no services in our area, that run frequencies similar to central London, Manchester or even the 21 Angel route in Newcastle.

Flexible Services

Question 4

Do you agree that flexible services should be expected to arrive or depart no more than five minutes late from the time period specified in the booking on 95% of occasions? If not, please give reasons.

By "flexible services" I assume you mean Direct Response Transport (DRT) services. DRT's have been hailed as the means of saving rural transport from complete collapse, but unfortunately they fail in almost every case. In East Kent a DRT was part funded by a developer and within 2 years it ceased to operate. Not because of poor timing, but because up to 60% of any potential passenger applications fail.DRTs do not allow passengers to engage with the services they wish to attend. They are OK if a brief jaunt for shopping or social engagement is all that is required,assuming a ride back is guaranteed, which is by no means certain, but not for everything else. This is expensive

technology used for little purpose.The answer is therefore: no the 95% timing rule is inapplicable for such services.

Mitigatory Features

Question 5

Do you agree that the mitigatory examples set out above are appropriate. Please explain reasons why you believe any should not be included.Should additional mitigatory examples also be included? If so, please explain.

For a start " Mitigatory" is a dreadful word and its use should cease. Mitigation should be applied according to circumstances, and not on some notional risk based template. Mitigation is there for "one off" or reasonably unforeseen circumstances. For example the test for mitigation would be a if sink hole appears in a road on the bus route.Could the bus operator have reasonably foreseen this event?
Applying that test to the example of a very hot summer is as follows. The UK has had a series of very hot summers, and indeed days when the ambient temperature was higher. Could the bus operator have foreseen this, bearing in mind that the Met office exists and gives out weather warnings? The answer would be yes. Could the bus operator have applied controls by warning passengers that services may be slower, and that the staff not only need adequate hydration but better cooling. A forward thinking operator would also ensure that vehicle cooling systems were given special attention, so breakdowns were reduced. To do none of this and then ask for mitigation is unreasonable and should be refused. If on the other hand the operator has shown that they have carried out due diligence, and yet still services were affected by the weather, for instance the tarmac en route starts to melt, or there is a wildfire, then mitigation can be applied. I hope this helps to come to some reasonable view on mitigation.

Question 6

If you believe that the performance standard should alter depending on the nature of service, please give examples of services and the reasons why the performance standard should differ.

Bearing in mind the template I have laid out in Q5, I cannot see any reason to apply different standards for flexible, or contract services. It's all about the operators' directing mindset.Are they forward thinking or do they let events overreach their own cherished beliefs in how a bus service ought to work. This is not 1950, and climate change is a

fact of life as is congestion, roadworks, and an ageing population that embark and disembark from PSVs more slowly than they did in the halcyon days of bus travel.

Question 7

If the provision of real time passenger information should be a mitigating factor what should the operator be expected to provide in order to rely upon the mitigation?

In East Kent, real time information are as rare as dragon teeth. The bus station at Canterbury is starting to be fitted withthem, but the layout is both minimal and it seems to lack the ability to deliver timely warnings of delays or cancellations. All the real time information does is say when a bus is expected, nothing more. So in that case the answer would be no, it would not be a mitigating factor. If on the other hand, bus route information was comprehensive and similar to that provided by the railways or sometimes airlines then that might be a reason to allow some mitigation. So, mitigation is reasonable, if (a) the information is timely and comprehensive, allowing the passenger to take steps to avoid delay or make other arrangements, and (b) this is not some way for the operator to avoid missing its timing point.

Question 8

Please provide thoughts on what evidence an operator should provide of working in the community on reducing digital exclusion in order for a traffic commissioner to take it into account.

The simplest real time information system requires both a power source and an internet connection with back office costs to integrate each bus stop into the operator network IT system.The cost per bus stop is estimated at £30,000 per bus stop, breaking down into £12,000 for the shelter, £12,000 for the electronic information, and £6,000 for integrating each bus stop with an IT system.E ink technology could reduce the electronic display cost, but even so it is an expensive business. Not something an operator would do. The alternative is an App. The problem with an App is firstly a substantial number of older passengers aged 65+ (Age concern posits a figure of 23%), do not possess a suitable smart phone or can use one. Even if you could reduce this digital exclusion, the app relies on a decent phone signal, and an App that is intuitive and easy to use. The Stagecoach App is neither of these.
So to plead mitigation, firstly there would have to be evidence of working with a passenger focus group, to reduce digital exclusion, as part of the operator/public interchange process. Secondly, a technical fix to enable bus stops to become phone signal booster stations, and thirdly an App that even the most digitally excluded could use with confidence, after a short course in its use. It really means that the operator should be properly embedded into the social fabric of the area that they serve.
In East Kent: There is no passenger focus group, neither is there a focus group for Kent. Thee is no evidence of any effort to overcome digital exclusion, and the Stagecoach App is poor going on dreadful as it often has glitches and does not convey problems, until the service disappears of the display or is abruptly cancelled. This is the gulf between the aspiration and the actuality in many parts of the UK.

Question 9
What weight should a traffic commissioner give where an operator is meeting a standard set out in an Enhanced Partnership Scheme which is lower than the expectations described in the current Statutory Document?

What point is there in having an Enhanced Partnership if it delivers a network of services below the standard set out in the statutory document?
Let me remind the Commissioners office that an Enhanced Partnership is meant to deliver a Bus Service Improvement Plan or BSIP. If the service level is below the statutory threshold, it is by implication, not an improvement.Enhanced Partnerships of this sort are the ones where the Bus Operator has brow beaten the local authority into settling for second, if not third best. Bearing in mind that public money will have been spent delivering the BSIP, this is a poor return on the money invested by the DFT and should be reported as such. I am afraid this sort of affair does happen, where the local authority has an ineffective public transport team or office, a lack of interest or policy making in improving bus services, and an operator which maintains its right to manage bus services , irrespective of funding provided by the local authority and central government. So to answer your question succinctly, no weight should be given in mitigation where standards have fallen so low, and furthermore it is the commissioners office duty to report such findings directly to the DFT. I strongly suspect that Kent falls into this category.

Timetables

Question 10
Should the guidance make a clearer statement that timetables must reflect the expected running time of the individual journey even if it creates a more complicated timetable for passengers? Please set out any benefits and drawbacks.

There is little point in deriving timetables that are a work of fiction rather than reality.Creating such timetables only puts meeting timing points at risk, and with it greater chance of overevving, driver fatigue, and breakdowns and bus fires. The 3 key causes of bus fires according to the DFT, are poor maintenance, overrevving the engine, and excessive heat in the engine bay. Two of those causes can be reduced if the type of bus is matched with the timetable. Buses built for London tend to be younger and with more powerful power plants as they are expected to operate in a traffic congested environment, with lots of stopping and starting. Non -Met bus services may well include some longer running periods between stops that are less wearing on the engine, transmission, and brakes. Even so and easing of the timetable by a few minutes might enable smoother running. It is common practice to see buses waiting along some sections, so that the timetable is adhered to overall. Where intervals of 10 minutes or less are programmed, it is important not to allow bunching of vehicles so that the frequency is maintained. Some times that purport to be hourly are variable when vehicles are sequestered for school bus work (No 12 Stagecoach SE), but that is not good practice, The railways invented fixed period timetables 100 years ago, and with good reason, as they bring with them a sense of order and predictability in travel. I am sure some passengers would like variable timetables for their own convenience, but one loses the predictability of knowing when a bus a bus is meant to arrive.

Timing Points

Question 11

Please provide suggestions on when it may be appropriate to allow an extended timing point beyond 15 minutes.

It may be current practice to have timing points 15 minutes apart, but it does lead to some absurdities, where bus stops are put in, to meet this 15 minute standard with no intention of ever picking up a passenger. I have seen several of these. If there is going to be a variation of this practice, then it should be for the convenience of passengers, such as at interchange points and railway stations etc.
If the commissioners are minded to allow a derogation, then the bus operator should explain exactly why this would be beneficial to passengers on a given route for the bus to be delayed or held back. There are some operators who make crew changes part way along a route (Stagecoach SE at Whitfield) which serves only the interests of the bus operator and not the passenger, so there is already some gaming of the system.

Traffic Management Act 2004

Question 12

Please provide your view on the benefits and impact of a traffic commissioner using their powers to request reports from a local authority when traffic management issues are cited as a reason for poor punctuality. Please provide any evidence on the estimated cost to providing reports.

In East Kent the main territorial operator Stagecoach SE often complains that a loss of punctuality is down to persistent road works.I cannot speak for them but I suspect they would be in favour of more bus gates, Bus lanes, and priority traffic light systems. Canterbury is one of the few places in East kent where these are found.I have not seen priority traffic light systems installed in the area.

The problem is manifold. Utilities turn up and blockade traffic lanes without much intervention from the county council. Kent has a resilience forum that could insist that utilities ask for permission before carrying out work.

Question 12 contd

The commissioners office is correct in surmising that highways departments and public transport departments often work in silos and do not cooperate.Kent County Council is an example of this. The utilities apply to the highways department, but it is often a formality.For example today (23/09/2026), I have passed through Borough green near Sevenoaks and found 2 excavations going on within 1/2m of each other on the A25. The highway they are digging up was freshly laid with tarmac,I know this because of its colour,texture and not having road markings, yet KCC Highways has allowed its own expensively laid highway to be dug up at will. No management action in getting the Utility work done before the new tarmac was laid.

KCC does install bus lanes and traffic lights, but normally, as in the case of Dover Fasttrack bus service, when their own contractors mismanage a project, something has to be done to alleviate a foreseeable problem that has arisen. If overall policy is based on the "Roads to prosperity" premise,bus services and their operating requirements will not be seen as a priority. The only time that KCC gets into hot water over its lack of leadership, coordination, and planning on network issues and roadworks, is when motorists complain. Their response in such cases is that they have no powers to restrain the Utilities.However they do have the power to manage them, which requires their district engineers actually to visit the various road works sites to oversee any restoration work.This hardly ever happens.

Question 13

Would a statement on what the Senior Traffic Commissioner considers to be good practice for local authorities be useful in managing network issues and roadworks? If yes, please provide examples of what you consider to be good practice.

Yes, I think a statement of good practice should be published and given to all local authorities and bus operators, so that each side can see what is expected of them. What would be good practice?

- A written statement from a utility seeking permission to excavate on the highway, detailing the nature of the work, the time to carry out the work, and how they intend to ameliorate any traffic delays.
- No application should be accepted on face value and passed automatically.
- Emergency applications should be genuinely emergencies and not used as a subterfuge to get round proper consultation. Records should be kept of those utilities using emergency applications and the details published in an annual register
- Before any application is accepted, it should go before a (weekly/monthly) panel of Highway department, Public transport department, Emergency services, and Public Transport operator staff to forewarn and work out plans to minimise delays and problems.
- Overrunning road works should be notified at the earliest opportunity and not left until the last minute when the blockade is planned to end.
- The Operators App should be constructed so that bus passengers know in advance why there bus is going to be delayed, and how long this situation will apply.
- If we take a look at the situation in Folkestone, when the former bus station and the local system was remodelled, there was complete chaos, with bus passengers , and the operator often kept in the dark, while construction went on around them, completely oblivious to the problems it was causing

Question 14
Should a traffic commissioner publish any report and send a copy to the Secretary of State?
Yes,in the interests of transparency and accountability. The Secretary of State should then require the local authority to deliver a plan to meet the finds of the report and improve the management of roadworks and other network issues. Furthermore, the Commissioner should follow up with further reports stating any evidence of improvements made, and what more needs to be done.

Question 15
Should a traffic commissioner allow a report to be used as mitigation by an operator?
If the operator can show that they have tried to engage with the Local authority, and if the Local Authority has shown no willingness to conform to best practice, then at the discretion of the Commissioner, mitigation might be allowed.But this cannot become a permanent feature, otherwise it will give the green light for Local authorities and Operators to do nothing, when adopting best practice could be in the public interest.

The Public Service Vehicles (Open Data) (England) Regulations 2020 (Bus Open Data)

Question 16

Do you agree that operators who have failed to publish any datasets and to engage with the support available to them should expect a financial penalty at the higher end of the scale? If not, please give reasons?

Reluctantly yes. If an operator after being urged to comply by the Commissioner's office, and being afforded support, with adequate time to comply with BODS, then there seems no alternative to a fine.

Question 17

Do you agree with the points set out as potential mitigation, and can you provide any further items that could be used as mitigation?

Yes, and I think the points set out are comprehensive and reasonable.

Question 18

Do you consider that it would be appropriate for cases regarding the failure to provide information to BODS (or any future equivalent service) to be dealt with outside of a public inquiry where a traffic commissioner considers the facts are clear? If not, why not? Please set out any benefits you consider arise from doing so, or from holding public inquiries.

Enquiries are always expensive and often involve additional litigation where one party seeks to absolve themselves of culpability.Provided the Commissioner's findings are reasonable and sustainable, with a clear breach of the requirements, there is no purpose in holding an enquiry . If however the breaches are wilful , persistent and of such magnitude, an enquiry may indicate to others who may be tempted to follow such a course of action, to err on the side of caution and comply with the commissioner's requirements. This would then be a matter of deterrence.

Question 19

Should notice of penalties issued under section 155 of the Transport Act 2000 be published in Notices and Proceedings even where a public inquiry is not held? Please explain your answer.

What is the public interest in withholding such information from the public. If of course the Commissioner thinks that the breach is minimal, and a technicality then the Commissioner might feel that such a disclosure serves no public interest. In local government, if even a minor infringement in the audit process occurs it is reported upon and is published, so you could argue if it is good enough for the government, it should be good enough for the private sector.

Question 20

Please provide any view on whether BODS data can be utilised and used as evidence of an operator's performance against the reliability standards expected. The Senior Traffic Commissioner is particularly interested in views on whether it could be used as evidence with no corroborating monitoring exercise being conducted.

According to BODS bus services in East Kent are between 80 to 100% punctual, allowing for the 5 minute mitigation, but this does not correlate with the admittedly empirical findings of many bus groups in the area. Bus punctuality, last minute cancellations are a big issue in East Kent, yet BODS is not recording this why?
It is all very well complying with BODS but if the data is not reliable in the first place how useful can it be?
There is no passenger focus group for Kent or East Kent. Interaction with Stagecoach and the local authority is informal and often insubstantial. BODS on its own if parties seek to game the system, will not deliver on driving up standards of reliability and punctuality. Look at this analogy. Would you accept the award of a Michelin star at a local restaurant if the only data used to award that star came from only one source, the restaurant owner? In order to uphold the Michelin star rating system, inspectors are sent out to examine the menu, the food, the ambience and the service, only then is the star awarded.The same should apply with bus services. I constantly monitor 3 local services Stagecoach SE: Routes 12, 81, and 93. Route 12 has few cancellations but is at least 30% of the time later than 10 minutes according to the timetable. Route 81 gives similar results. Route 93 is a real shocker. It only runs 3 times per day, but has often been 30 minutes late, or correspondingly 10 minutes early. It seems to run on a timetable of its own, without reference to the published timetable, which is why patronage is often sparse.Nobody knows when it is going to turn up. I don't think BODS is picking this up. BODS is suitable for analysis and as a starting point, but for passengers a star rating might be more understandable. In their daily lives passengers might use several ratings agencies and often give feedback. Now this is not 100% reliable, but it can't be gamed easily, and businesses move heaven and earth to get a good rating from Trustpilot or Feefo. Perhaps the discipline of the market ought to be applied to those who constantly harp on about how market solutions are better than Franchising or Municipalisation.

Franchising and Enhanced Partnerships

Question 21

Do you agree that the operation of a local bus service in contravention of the franchising scheme should result in a starting point for a financial penalty £550 for each vehicle authorised under the PSV operator's licences held by the operator?

No, there is no place for the Commissioners office in awarding fines or penalties in the matter of a franchise, unless the franchising body feels that it is necessary to set an example to putative franchise holders. Franchising is a matter of contract law and the remedy for the franchising body is available through the courts. However, the franchise body could call on the Commissioner's office to furnish evidence of a breach of the terms of a franchise, in any ongoing litigation.

Question 22

Is it proportionate for this sanction to be reduced depending on the factors set out above?

In view of answer to question 21, the question is inapplicable , as no penalties should be issued, unless there are certain circumstances requiring such action.

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